

STATE OF CONNECTICUT

DEPARTMENT OF TRANSPORTATION



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Date:

March 8, 2017

To:

The Federal Communications Commission

Washington, D.C. 20554

Subject: Response to Public Notice-Comment Sought on Streamlining Deployment of Small Cell

Infrastructure by Improving Wireless Facilities Siting Policies

Mobilitie, LLC, Petition for Declaratory Ruling

WT Docket No. 16-421

COMMENTS BY THE DEPARTMENT OF TRANSPORTATION

The Connecticut Department of Transportation's (CTDOT's) primary mission is to provide a safe, efficient and cost effective transportation system that meets the mobility of its traveling public. For interstate highways or anywhere within the State's highway right-of-way, no installations of utility facilities shall be allowed if it adversely affects public safety. Furthermore, CTDOT's policy concerning installations within the State right-of-way is published in the "CTDOT Utility Accommodation Manual."

The Department's concern is that Mobilitie may be seeking to circumvent practices and policies which ensure that the CTDOT protects the safety and welfare of the traveling public. Mobilitie's attempt to install pole towers (transport or mini-micro poles) within the state's highway right-of-way may be impacted by state highway construction projects requiring the relocation of such facilities. Wireless installations deserve careful review because facilities installed at various sites within the State right-ofway may pose safety hazards.

For the reasons stated above, the CTDOT strongly opposes any changes to the Federal Communications Commission (FCC) rules which would reduce the CTDOT's ability to control the State highway right-of-way for the intent of protecting the safety and welfare of the public. CTDOT requests that the Federal Communications Commission deny Mobilitie's petition for unrestricted rights to install its telecommunication facilities within the State right-of-way.

However, the CTDOT would not be opposed to reviewing and evaluating requests submitted by Mobilitie on a case-by-case basis. In the event that CTDOT determines that a site location proposed by Mobilitie shall not create an unsafe transportation system to the traveling public, then approval may be granted to Mobilitie regarding the installation of its facilities within the State right-of-way.

Submitted by,

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